

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875 HON. ROBERT B. KUGLER
THIS DOCUMENT RELATES TO ALL CASES	

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

**TO: Lori G. Cohen, Esq.
Greenberg Traurig, LLP
3333 Piedmont Road NE, Suite 2500
Atlanta, GA 30305**

Attorneys for Defendants

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition via Zoom, of Lewis Chodosh, M.D., on March 10, 2022, at 9:00 am EST, and continuing until completion, at Greenberg Traurig, LLP, 1717 Arch Street, Suite 400, Philadelphia, PA 19103 via Zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The witness shall produce the documents requested at Exhibit A, attached hereto, at least two days in advance of the deposition, to the extent not already served upon Plaintiffs.

TAKING ATTORNEY FOR PLAINTIFFS:

Rosemarie Riddell Bogdan
Martin, Harding & Mazzotti, LLP
1 Wall Street
Albany, NY 12205
Tel: 518-862-1200
rosemarie.bogdan@1800law1010.com

The videotaped deposition will be taken via Zoom before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

March 1, 2022

PLAINTIFFS' COUNSEL

By: /s/ Rosemarie Riddell Bogdan
Rosemarie Riddell Bogdan
Martin, Harding & Mazzotti, LLP
1 Wall Street
Albany, NY 12205
Tel: 518-862-1200
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EXHIBIT A

DOCUMENT REQUESTS

1. Copies of all invoices for work performed in connection with any consultation or expert work performed for or on behalf of any defendant or their counsel with regard to any issues in this MDL, including but not limited to for the review of documents, review and consultation with regard to plaintiff experts, preparation of Dr. Chodosh's report, and preparation for deposition or trial. Note: If the witness does not have up to date invoices, the witness is requested to be prepared to orally provide the dates, time amounts, and subject matter of all such work.
2. Any notes, i.e. written or electronic, reflecting consulting or litigation work that has not been documented in invoices.
3. Copies of any notes or other documentation, including PowerPoints, for any presentations, seminars, or classes, given by Dr. Chodosh with regard to the risks and benefits of any angiotensin II receptor blockers or nitrosamines.
4. Copies of any notes or other documentation, including PowerPoints, for any presentations, seminars, or classes, given by Dr. Chodosh with regard to medical monitoring for any purpose, including but not limited to with regard to any health effects from exposure to any nitrosamines.
5. All documents relating to any remuneration you have received from any manufacturer, distributor, or retailer of pharmaceutical drugs.
6. Any articles, presentations, seminars, classes, or other similar documents (including PowerPoint-type slides) authored or used by Dr. Chodosh with regard to hypertension, treatments for hypertension, ARBs, or medical monitoring plans.
7. Copies of any documents or articles relied upon for the opinions set forth in the report served, if not listed in the report.
8. Copies of any documents or articles reviewed in connection with the report served, whether or not listed in the report or attachments thereto.
9. Documentation of any research the witness has performed with regard to any angiotensin II receptor blockers, or nitrosamines, or health effects potentially related thereto.
10. Copies of any documents including protocols or information about medication side effects, in the possession of or reviewed by the witness, which set forth information

related to the risks and benefits, or medical monitoring, with regard to any substance, including of any angiotensin II receptor blocker or nitrosamines.

11. Copies of all Publications and Presentations listed in Dr. Chodosh's CV, which is Exhibit A to his Expert Report, and any updated CV or testimony list.
12. Any illustrations, PowerPoints, images, charts, tables or demonstrative exhibits that may be used by or with Dr. Chodosh in connection with a Daubert hearing or trial testimony in this litigation.
13. Documentation of any research grant the witness has been provided to study any angiotensin II receptor blockers, or nitrosamines, or health effects potentially related thereto.
14. Documentation of any work performed for or on behalf of any defendant manufacturer and/or defense law firm, in this MDL, at any time.
15. All documents reflecting valsartan or any other drug recalls relating to nitrosamines that you received, reviewed, or sent.
16. Any documents or other communications the witness has received from any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, and/or medical monitoring as to the potential risks thereof, outside of information provided by counsel who retained the witness.
17. Any communications from the witness to any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, and/or medical monitoring as to the potential risks thereof, outside of communications to counsel who retained the witness.
18. Any textbook referenced by the witness in forming his opinions.
19. All documents reflecting any communications with patients concerning valsartan (you may redact patient identifiers and unrelated HIPAA-protected information).
20. All documents relating to any pharmacy benefit on which you consulted, including identity of entities and persons with whom you consulted.
21. Copies of all transcripts of testimony under oath given by Dr. Chodosh in the last 10 years.

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CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2022, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' COUNSEL

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